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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

WALTER BILLUPS,

Plaintiff,

vs.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 3:18-cv-03098-EDL

**STIPULATION AND ~~PROPOSED~~
ORDER FOR AN EXTENSION OF TIME**

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant shall have a 21-day extension of time, from December 13, 2018 to January 3, 2019, for Defendant to respond to Plaintiff's Motion for Summary Judgment (Dkt. No. 18).

1 This is Defendant's first request for an extension of time. Defendant submits that good
2 cause exists for this extension because the parties have recently engaged in settlement
3 discussions and could not agree on the issue of remedy. Defendant anticipates filing a Motion
4 for Remand, which will significantly reduce the number of issues that this Court will need to
5 resolve and will largely focus on whether this matter should be remanded for further proceedings
6 or an award of benefits. The requested extension will also help accommodate Defendant's
7 counsel's workload, which includes a Ninth Circuit answering brief, numerous other district
8 court cases, and other substantive non-litigation matters within the Office of General Counsel.
9 Defendant's counsel will endeavor to complete the response as soon as possible. This request is
10 made in good faith and with no intention to unduly delay the proceedings, and counsel
11 apologizes for any inconvenience.

12 Plaintiff does not oppose Defendant's request for an extension of time. The parties
13 further stipulate that the deadline for any reply by Plaintiff will be extended accordingly.

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15
16 Respectfully submitted,

17 Dated: December 12, 2018

Anne M. Su
(*as authorized via email on December 11, 2018)
ANNE M. SU
Attorney for Plaintiff

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21 Dated: December 12, 2018

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25 By: /s/ Allison J. Cheung
ALLISON J. CHEUNG
26 Special Assistant U.S. Attorney
27 Attorneys for Defendant
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ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: 12/12/18


THE HONORABLE ELIZABETH D. LAPORTE
United States Magistrate Judge